



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 25, 2006

John Wilhelm, Treasurer
UNITE HERE TIP Campaign Committee
275 Seventh Ave, 10th Floor
New York, NY 10001

Response Due Date:
September 25, 2006

Identification Number: C00004861

Reference: July Monthly Report (6/1/06-6/30/06)

Dear Mr. Wilhelm:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule E of your report discloses a total of \$4,014.84 in payments to your connected organization for "Reimb. Car Rental", which appears to have been made in support of "Bennie Thompson", a federal candidate. 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising activities only if the corporation or labor organization receives **advance** payment for the fair market value of such services. 11 CFR §114.2(f)(2)(i)(A), (C) and (E)

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected

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